

DEREK SMITH LAW GROUP, LLP
Alexander Cabeceiras (SBN 338857)
633 W. 5th Street, Suite 3250
Los Angeles, CA 90071
Telephone: (332) 910-5631
Facsimile: (212) 587-0760
Email: alexc@dereksmithlaw.com

Attorneys for Plaintiff Viola Sullivan

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

Case No.: 2:23-cv-2351-KJN

VIOLA SULLIVAN, an individual,

Plaintiff,

vs.

STIPULATION

COUNTY OF TEHAMA, a public entity,
TEHAMA COUNTY SHERIFF'S OFFICE, a
public entity,
DAVE KANE, Tehama County Sheriff, in his
individual and official capacity as Sheriff,
JESSE BROWN, Deputy, an individual,
D. GISBON, an individual,
DOES 1-25, inclusive,

Defendants.

STIPULATION

The parties, by and through their undersigned counsel, agree to the following:

1. Plaintiff will file an Amended Complaint (*Attachment A*) simultaneously with this stipulation;
2. Thereafter, Defendants will have thirty days to submit an Answer to the Amended Complaint;
3. The Court shall deem the pending Motion to Dismiss (ECF Dckt. No. 4) as moot;
4. The Court shall schedule an initial conference at a convenient date;
5. The caption of this case shall be changed to:

STIPULATION

VIOLA SULLIVAN, an individual,

Plaintiff,

vs.

COUNTY OF TEHAMA, a public entity,
TEHAMA COUNTY SHERIFF'S OFFICE, a
public entity,
DAVE HENCRATT, Tehama County Sheriff, in
his individual and official capacity as Sheriff,
JESSE BROWN, Deputy, an individual,
DANIELLE GIBSON, an individual,
DOES 1-25, inclusive,

Defendants.

Case No.: 2:23-cv-2351-KJN

6. Defendants shall accept service of the Amended Complaint on behalf of Defendants, including the newly named party Dave Hencratt.

Date: December 4, 2023

Respectfully Submitted,

/s/ Alexander G. Cabeceiras

Alexander G. Cabeceiras, Esq.
DEREK SMITH LAW GROUP, LLP
633 W. 5th Street, Suite 3250
Los Angeles, CA 90071
Attorneys for Plaintiff

/s/ Tracey A. Werner

Tracey A. Werner, Esq.
Maire & Deedon
2851 Park Marina Dr., Suite 300
Redding, CA 96001
Attorneys for Defendants

STIPULATION


ORDER

Good cause having been shown, the Court adopts the stipulation of the parties as its order. It is hereby ordered that:

1. Plaintiff will file an First Amended Complaint filed at ECF No. 13 is accepted by the Court;
2. Not later than thirty (30) days following the date this Order is electronically filed, Defendants shall submit an Answer to the Amended Complaint;
3. The pending Motion to Dismiss (ECF No. 4) is DENIED as moot;
4. The caption of this case shall be changed as set forth above;
5. Defendants shall accept service of the Amended Complaint on behalf of Defendants, including the newly named party Dave Hencratt.

IT IS SO ORDERED.

Dated: December 7, 2023


MORRISON C. ENGLAND, JR.
SENIOR UNITED STATES DISTRICT JUDGE